

ORIGINAL

2 UNITED STATES DISTRICT COURT
3 EASTERN DISTRICT OF NEW YORK

3 -----X
4 GURSEWAK SINGH,

5 PLAINTIFF,

6 -against- Case No:
7 18-CV-5780

8 LINTECH ELECTRIC, INC.; LINDEN J. TUDOR,

9 DEFENDANTS.

10 -----X
DATE: September 23, 2019

11 TIME: 10:45 a.m.

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13 DEPOSITION of the Defendant,
14 LINDEN J. TUDOR, taken by the Plaintiff,
15 pursuant to a Court Order and to the
16 Federal Rules of Civil Procedure, held at
17 the offices of Diamond Reporting & Legal
18 Video, 16 Court Street, Suite 907, Brooklyn,
19 New York 11241, before Tina M. Haywood, a
20 Notary Public of the State of New York.

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1 TUDOR

2 question and then I get the answer. Okay?

3 Thank you.

4 When you say New York City, do
5 you mean different agencies of the City?

6 A. Yes, sir.

7 Q. What agencies have you worked
8 for?

9 A. I do work for New York City
10 Housing Authority, NYCHA, and New York
11 City -- it's EDC; that's New York City
12 Economic Development.

13 Q. Anybody else?

14 A. New York City DDC, small jobs.

15 Q. Are you presently doing any
16 work for any of the New York City agencies
17 that you just identified?

18 A. Yes. We are still finishing up
19 work for NYCHA.

20 Q. And what work was it that you
21 were doing?

22 A. We were installing lights and
23 power for the sidewalk sheds.

24 Q. Is there anything else that you
25 were doing for NYCHA?

1 TUDOR

2 A. No, that's it.

3 Q. And if I asked you going back
4 to the time since 1995 when you were doing
5 work as Lintech Electric, have you done
6 work for NYCHA other than what you just
7 described?

8 A. No. NYCHA -- no. I did work
9 for Housing, HPD.

10 Q. You did work for HPD?

11 A. Yes.

12 Q. And when you did work for HPD,
13 what kind of work did you do?

14 A. Electrical work. It was
15 internal residential wiring.

16 Q. Now in order to be able to work
17 for NYCHA, is there some kind of process
18 you have to go through to apply?

19 A. Yes.

20 Q. What is it that you have to do?

21 A. Actually, the general
22 contractor or GC, they will have to hire
23 me, hire Lintech as a subcontractor, and at
24 that point, they will submit my name,
25 company name, to NYCHA and then they'll

1 TUDOR

2 A. I took them there.

3 Q. And how did you do that?

4 A. I drove them there.

5 Q. And where did you go?

6 A. To NYCHA's office.

7 Q. Located where?

8 A. On Broad Street -- Broadway.

9 Q. And there were certain
10 containers?

11 A. Yes.

12 Q. Describe the containers they
13 came in.

14 A. Cardboard storage boxes.

15 Q. Okay. You know there are
16 different boxes; different kinds.

17 A. Yeah, crates.

18 Q. They were the long ones? the
19 short ones?

20 A. Cardboard crates.

21 Q. How many cardboard crates full
22 of documents did you deliver to NYCHA?

23 A. About ten of them or more.

24 Q. And when did you make a request
25 for them to give them back to you?

1 TUDOR

2 A. Well, I didn't make no request.

3 When they finish, they return it to me.

4 Q. I'm sorry. I thought your
5 attorney asked you that you had requested
6 them --

7 A. I requested the information
8 specifically to Gursewak Singh. I
9 requested the information, so specifically
10 to Gursewak Singh. They, in turn, said
11 they would look through and see if they
12 could find it and then they would forward
13 it to me.

14 Q. Oh, I see. So you asked them
15 just look into what you gave them and give
16 you information about Gursewak Singh?

17 A. Yes.

18 Q. Did you do it in writing?

19 A. No. We communicate by phone
20 and e-mail, yes.

21 Q. So you have an e-mail that you
22 sent them that said what?

23 A. No.

24 Q. No, just from your
25 recollection.

1 TUDOR

2 A. I have the e-mail.

3 Q. When did you send the e-mail?

4 A. We sent it -- last week, I sent
5 the e-mail and I got a response.

6 Q. Oh, I see. So it was last week
7 that you sent the e-mail?

8 A. Yes, but we had made efforts
9 prior to that.

10 Q. What efforts did you make prior
11 to that?

12 A. To request the information, but
13 we got a response last week.

14 Q. And when did you make your
15 prior request?

16 A. It was early in this year. I
17 can't remember.

18 Q. When?

19 A. I can't remember.

20 Q. Was it before or after the
21 summer?

22 A. Might be just before summer.

23 Q. So the summer begins in June,
24 so was it in May or April?

25 A. I can't remember. Whatever it

1 TUDOR

2 is, I can't remember because I --

3 Q. I'm asking your best
4 recollection.

5 A. I know. What happened during
6 that period, I was really sick and was in
7 the hospital --

8 Q. I'm sorry about that.

9 A. -- and there's a lot of things
10 I can't remember.

11 Q. I understand. That's fine if
12 you don't remember.

13 That request, that first
14 request you made, how did you make it? In
15 writing? Did you call them up?

16 A. E-mail.

17 Q. So you have that e-mail as
18 well?

19 A. We can do a search for that
20 e-mail.

21 Q. No. The question is: Do you
22 have that e-mail? In other words, you
23 e-mailed it?

24 A. (No response.)

25 Q. And in that e-mail, what did

1 TUDOR

2 you say?

3 A. I really can't remember. I was
4 just asking for information.

5 Q. Well, give me the gist of it.

6 Sort of in summary, what did you request?

7 A. The information related to
8 Gursewak Singh.

9 Q. Did you ask for anything in
10 particular or you just said every piece of
11 paper that has his name on it? How would
12 you describe it?

13 A. The latter; everything related
14 to Gursewak Singh.

15 Q. Did your e-mail say "send me
16 everything that has anything to do with
17 Gursewak Singh" or did it say something
18 else?

19 MR. MIZRAHI: I'm going to
20 object on the basis of misconstruing
21 testimony. The question was asked
22 and answered.

23 Q. What were the words that you
24 used to make your request?

25 A. I can't remember.

1 TUDOR

2 Q. Do you have it on your phone
3 now?

4 A. What I have is --

5 Q. No, that one; that prior
6 request.

7 A. No.

8 Q. And if you were going to look
9 for the request you made last week, you can
10 access it by your phone through your
11 e-mail?

12 A. Yes, because I got a response.

13 Q. The same e-mail that you've
14 been using for the last year or a different
15 e-mail?

16 A. It might be a different e-mail.

17 Q. What different e-mail would you
18 have used?

19 A. At the time, we were operating
20 with -- I said we had a problem with one
21 e-mail, with identity theft, so a lot of
22 materials...

23 Q. So when did you have that
24 changeover from one e-mail to the next?

25 A. Sometime this year. I can't

1 TUDOR

2 remember.

3 Q. Before or after you made the
4 first request?

5 A. I can't remember.

6 Q. Did you follow up that first
7 request in any way after that?

8 A. Right now, we follow up last
9 week.

10 Q. So last week was the follow up?

11 A. Yes.

12 MR. SILVER: Nothing further.

13 (Whereupon, at 2:15 p.m., the
14 Examination of this witness was
15 concluded.)

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